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because Section 3220 provides that when process is directed to an officer, it may be executed by any other officer to whom it might lawfully have been directed, and as we have seen above it can lawfully be directed only to the sheriff of the City of Richmond. It follows therefore that process in such cases can not be executed by any officer but that there must be an order of publication under Section 3225. Such a state of affairs does not apply to public service corporations, or suits on certain bonds, or suits for damages for a wrong, or where there are two or more defendants on one of whom process has been executed in the county or corporation in which the suit was brought; but all other cases are governed by this most arbitrary and unreasonable rule. There can be no good reason why there should be an order of publication against a domestic corporation when personal service can be had. The revisors of 1849 eliminated from § 3220 this strange provision, but the General Assembly put it back. Mr. Lile in his Notes on Corporations has a very perspicuous analysis of the last-mentioned section, and in 2 Va. Law Reg. 545 will be found a note comparing publication thereunder with those had under § 3230.

Bankruptcy—Trustee—Title to Legacy.—A legacy vesting in a bankrupt upon the date of adjudication but prior to the filing of his petition passes to his trustee. *In re McKenna*, 15 Am. B. R. 4.

Bankruptcy—Lien—Transfer of Dower as Consideration for Deed of Trust.—Where more than four months prior to adjudication, the bankrupt, in furtherance of repeated promises to secure his wife for money borrowed from time to time, executed a deed of trust upon a certain farm to secure payment of his debt to her in consideration of her joining in another deed of trust on the same day, by which she surrendered her contingent right of dower in and to his farm to the extent of \$12,500 of its value, and it is not shown whether such dower right would be less, equal or more than the value of the preference given in consideration of its surrender, the deed of trust to her will be sustained to the amount secured to her. *In re Porterfield*, 15 Am. B. R. 11.

Bankruptcy—Jurisdiction—Stay of Execution Sale.—A sale of a bankrupt's real estate under an execution issued upon a judgment recovered against him more than four months anterior to his adjudication, may be stayed in the discretion of the bankruptcy court. *In re Baughman*, 15 Am. B. R. 23.

Insane Person—Appointment of Committee—Notice—Sec. 1697, Va. Code 1904.—In *Karnes v. Johnston*, 52 S. E. 658, the Supreme Court of Appeals of West Virginia delivered an opinion which is very im-